



National Head Start Association

Head Start: The Nation's Pride...
Celebrating 40 Years of Success

October 6, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Subject: WC Docket No. 05-195

| Dear Ms. Dortch:

On July 20, 2005, the Federal Communications Commission (FCC) requested public comments on the management and administration of the Universal Service Fund.¹ We are requesting that the FCC guarantee the eligibility and participation of Head Start programs in the Universal Service Fund E-rate program. Head Start is a comprehensive early childhood development program serving primarily low-income preschool-age children and their families.

The E-rate program has provided discounts to help most schools and libraries in the United States to obtain affordable telecommunications and Internet access. Greater discounts are offered to schools located in rural and low-income school districts. This is consistent with the broader mission of the Universal Service Fund. We believe that the population Head Start programs serve, trends in education policy at state and federal levels, and increased child outcomes as a result of a strengthened telecommunications infrastructure support the participation of Head Start programs in the E-rate program.

The National Head Start Association (NHSA) represents Head Start programs serving nearly one million Head Start children and their families each year, including many Head Start programs operating in rural and low-income school districts throughout the United States. Head Start programs are federally-funded school readiness programs that serve many of the same individuals that the E-rate program was designed to help. In addition to offering high quality preschool programs, Head Start serves economically disadvantaged children and their families by providing them with comprehensive health, nutrition, and parent involvement services.

When the E-rate program began in 1996, it was limited to K-12 schools, but its eligibility should be expanded to include Head Start programs because many K-12 school systems have become PreKindergarten-12 (PreK-12) school systems. Five mutually reinforcing trends at the

¹ Federal Communications Commission. (2005, July 20). Comprehensive Review of Universal Service Fund Management, Administration, and Oversight. *Federal Register*, 70, no. 138, 41658-41678.

state and national levels have emerged in the past decade and have contributed to the development of PreK-12 school systems.

These trends are as follows:

- 1) Increasing number of states have established Pre-K programs and preschool standards that align with K-12 standards;
- 2) Increasing integration and alignment of Pre-K systems with elementary and secondary school systems;
- 3) Increasing collaboration of state-funded Pre-K programs with Head Start programs;
- 4) Growing need for teachers in early childhood programs to acquire higher academic credentials as teachers in primary and secondary schools have; and
- 5) Increasing number of states have established teaching certification standards for early childhood education that typically covers Pre-K through grade 3.

Since the E-Rate program began, many states have created statutes that commit state funding for Pre-K programs, and 38 states now have state-funded Pre-K programs.² Several states have or are moving toward having universal state-funded Pre-K programs.³

Many states have developed state Pre-K standards to align with their K-12 academic standards, and the federal government is encouraging this alignment of Pre-K programs with elementary and secondary school systems. The No Child Left Behind Act and the Bush administration's Good Start, Grow Smart initiative challenge the U.S. Department of Education and U.S. Department of Health and Human Services to support state efforts that encourage early literacy and facilitate the smooth transition from Pre-K to kindergarten.

Within these state Pre-K-12 systems, collaboration among the state educational agencies and departments, state-funded pre-k programs, and Head Start programs has dramatically increased. Many Head Start programs are administered by the public schools. During the 2002-2003 school year, 17 states provided supplemental funding to Head Start programs.⁴ As a result of this collaboration, Head Start programs have developed strategies and procedures that promote the successful transition of children graduating from Head Start preschools into kindergarten programs.

² Barnett, W., Hustedt, J., Robin, K., and Schulman, K. (2004). *The State of Preschool, 2004 State Preschool Yearbook*, New Brunswick, NJ: National Institute for Early Education Research, 37.

³ Ibid., 28.

⁴ Ibid., 179.

In fact, Head Start Reauthorization legislation just recently approved by the U.S. House of Representatives and Head Start Reauthorization legislation currently under strong consideration by the U.S. Senate would further encourage the integration of Head Start programs with state-funded Pre-K programs. This legislation seeks to improve the alignment of Head Start programs with state academic standards and encourages Head Start programs to coordinate their services and training with state-funded Pre-K programs and their assigned local education agencies.

Current Head Start Reauthorization legislation also calls upon Head Start grantees to hire more teachers and staff with baccalaureate and associate degrees in early childhood education. If enacted into law, significant numbers of teachers and staff will need to obtain these credentials, and their demand for online distance learning will increase. E-rates discounts on Internet access would help them to obtain the credentials and professional development mandated, improving the quality of education for all Head Start children.

Research has demonstrated the value of high quality preschools with accredited teaching staff in improving outcomes for children, especially those in low-income and rural school districts served by Head Start programs. This research has encouraged an increasing number of states to set up teaching certification standards and requirements for early childhood education teachers that typically covers pre-k through grade 3.

Additionally, the requirement to plan, develop, and implement a technology plan as a condition for receiving the E-rate discount would provide a critical incentive to Head Start programs to acquire an adequate telecommunications infrastructure to serve their children and staff. Enhanced broadband access to the Internet would provide direct benefits to children by providing access to multimedia content integrated within pre-k curricula. It would also help teachers to record and document improvements in child outcomes. This infrastructure would strengthen communications systems in these programs, including long distance telephone services, and would facilitate the provision of better-integrated services for children. Head Start staff and teachers would benefit from improved access to up-to-date information both internally (tracking children and services) and externally (local, state, regional, and national issues) allowing them to respond quickly to meet the needs of children and families. Head Start grantees could take full advantage of information and communication technologies, including ready access to the latest early childhood research, new sources of funding, and networking within and across programs that can enhance services to children and families.

It is time to recognize the evolution of our nation's school systems from K-12 to PreK-12 systems. While this transition is not complete, those states that have made a commitment to integrate their Pre-K system with their K-12 system deserve to benefit from the E-rate program. We therefore respectfully request that the FCC acknowledge those states that have made a commitment to develop Pre-K-12 systems and develop decision rules that will guarantee the eligibility and participation of Head Start programs in the E-rate program of the Universal Service Fund. We are also requesting that the FCC guarantee the eligibility and participation of Head Start programs in the Universal Service Fund E-rate program if the following conditions are met: 1) a state statute mandating the provision of preschool services has been established;

2) a state provides support to Head Start programs; and 3) a state can demonstrate efforts to align and integrate pre-k services within the K-12 system.

Thank you for providing this opportunity to provide comments on the E-rate program. If you have any questions or comments, please do not hesitate to contact me at (703) 299-7500.

Sincerely,

A handwritten signature in black ink that reads "Sarah M. Greene". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Sarah M. Greene
President and CEO